

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LINDA MIGLIORI, FRANCIS J. FOX,  
RICHARD E. RICHARDS, KENNETH  
RINGER, and SERGIO RIVAS,

Plaintiffs,

and

ZACHARY COHEN,

Intervenor-Plaintiff,

v.

LEHIGH COUNTY BOARD OF  
ELECTIONS,

Defendants,

and

DAVID RITTER,

Intervenor-Defendant.

No. 5:22-cv-00397-JFL

**EMERGENCY MOTION FOR AN INJUNCTION PENDING APPEAL**

Plaintiffs Linda Migliori, Richard E. Richards, and Sergio Rivas hereby move pursuant to Rule 62(d) of the Federal Rules of Civil Procedure for an injunction pending appeal of this Court's Judgment and Order issued on March 16, 2022. Plaintiffs respectfully request that the Court grant their Motion and issue an injunction consistent with the attached Proposed Order. The grounds for this Emergency Motion for an Injunction Pending Appeal are more fully set forth in the accompanying Memorandum of Law, which is fully incorporated herein by reference.

Respectfully submitted,

Dated: March 18, 2022

/s/ Witold Walczak

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**CERTIFICATE OF SERVICE**

I, Witold J. Walczak, hereby certify that on March 18, 2022, I electronically filed the foregoing Emergency Motion for an Injunction Pending Appeal using the Court's CM/ECF system, causing a notice of filing to be served upon all counsel of record.

/s/ Witold J. Walczak  
Witold J. Walczak